

Exhibit 14

Exhibit 14

DECLARATION No 2 OF MICHAEL ERWINE

I, Michael Erwine, declare that the assertions in this Declaration are true and correct, based upon my personal knowledge, and that I am competent to testify to the facts stated below:

1. I am the Plaintiff in the lawsuit Michael Erwine v. Churchill County and Churchill County Sheriff Benjamin Trotter currently pending before the Federal District Court in Northern Nevada;
2. From December 9, 2015 and October 10, 2016, I was employed by Churchill County in the capacity of Detention Deputy at the County Jail. From the commencement of my employment with Churchill County, I witnessed Churchill County sheriff's deputies blatantly disregarding basic Constitutional rights of inmates at the jail, and further disregarding the essential duties of a Detention Deputy.
3. After leaving the Churchill County Sheriff's Office, I sought employment elsewhere with numerous law enforcement agencies that had posted job openings across the entire State of Nevada.
4. I kept receiving rejection letters from the other agencies, copies of which are attached hereto as Attachment A. These rejection letters kept making references to failed background checks. In the November 14, 2017, letter from North Las Vegas Police it states I was "...ineligible to continue in the employment process for the position of Police Officer ... " for character issues and his employment history," and "You are disqualified indefinitely."
5. After reviewing the rejection letters listed above, I suspected that something was placed into my file at Churchill County without my knowledge. I requested my employee file from the Churchill County Sheriff's Office on several occasions but was refused my file until I received a copy via email on

April 13, 2018.

6. When I received my employee file from Churchill County, I saw the October 10, 2016 Memorandum by Sheriff Trotter for the first time and it became clear why I was being rejected from the other jobs I had applied for, and I immediately began seeking legal counsel to help me with my case against Churchill County.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 1/18/20 in Reno, Nevada

By: 

Michael Erwine

Attachment A

Attachment A

WASHOE COUNTY SHERIFF

Commitment to Community



Chuck Allen
Sheriff

January 17, 2017

Michael Erwine



Dear Mr. Erwine,

Thank you for your interest in employment with the Washoe County Sheriff's Office.

Washoe County is an Equal Opportunity Employer. This commitment requires us to ensure that each applicant receives equal access and equal consideration in the employment process.

The Sheriff's Office has determined that you do not meet the established standards for a position as Deputy Sheriff and therefore you have not been selected at this time. In accordance with the Washoe County Code 5.185, you are unable to be considered for any position at the Sheriff's Office for one year from the date of this letter.

In accordance with the Pre-Employment Investigation Discovery Waiver you signed and had notarized, we are unable to provide any information accumulated in the course of the background investigation to you or any other entity.

The interest you have shown in becoming a member of the Washoe County Sheriff's Office is appreciated. We wish you well in your career pursuit.

Sincerely yours,

CHUCK ALLEN, SHERIFF

By: _____

A blue ink signature of Captain Jerry Baldrige.
Captain Jerry Baldrige
Administrative Bureau

From: Background Section <BackgroundSection@LVMPD.COM>

To: mikeerwine22 <mikeerwine22@aol.com>

Cc: Scott Olson <S6388O@LVMPD.COM>

Subject: LVMPD BACKGROUNDS REVIEW LETTER

Date: Tue, Feb 7, 2017 7:08 am



Dear Candidate: MICHAEL ERWINE

All candidate files are carefully reviewed to ensure that accurate and thorough investigations are completed. Based on review of your background history, you will no longer be considered for the position(s) of **POLICE RECRUIT C16-001 NOVEMBER** with the Las Vegas Metropolitan Police Department.

Candidate does not meet LVMPD hiring standards based on **EMPLOYMENT HISTORY**.

You are not eligible to apply with LVMPD for any position indefinitely, and your name will be removed from all eligibility list(s) and processes.

The background investigation is designed to evaluate candidates based on characteristics of a person's complete life history and suitability for employment and based on the LVMPD hiring standards. Details of a background investigation and the information obtained cannot be disclosed. The release you signed during the background interview waived your rights to privacy as outlined in Title 5 of the U.S. Code.

The Las Vegas Metropolitan Police Department would like to thank you for expressing interest in employment with our Department. We are very dedicated in our mission of excellence through a strong commitment to our hiring standards. These standards are confidential and are not available for applicants or current employees to view. No assumption is made that you could not be approved for appointment with another police department.

Sincerely,

JOSEPH LOMBARDO, SHERIFF

By: TERRY BERNARD, LIEUTENANT
OHR/BACKGROUNDS SECTION
JL:TB:SO:ka

ERW0067



Department of

ALTERNATIVE SENTENCING

Carson City



Tad Fletcher, Chief

Date: 9/8/2017

To: Mike Erwine


Dear Mr. Erwine,

Thank you for your interest in the Carson City Department of Alternative Sentencing. This letter is to inform you that you are no longer being considered in the current recruitment due to failing one or more portions of the selection process:

- | | |
|---|--|
| <input type="checkbox"/> Pre-screening (minimum qualifications) | <input type="checkbox"/> Written Testing |
| <input type="checkbox"/> Physical Agility Testing | <input checked="" type="checkbox"/> Background Investigation |
| <input type="checkbox"/> Oral Board Panel | <input checked="" type="checkbox"/> Chief's Review |
| <input type="checkbox"/> Other _____ | |

Pursuant to the pre-employment waiver and the liability release form, **you have no right of review** of any information obtained during the selection process.

Based on our recruitment standards you are precluded from reapplying with our agency in the future. Again, thank you for your interest in the Carson City Department of Alternative Sentencing. Best wishes in your future endeavors.

Sincerely,





Douglas County

SHERIFF

"A Tradition of Service"

Ron Pierini
SHERIFF

September 12, 2017

Mr. Michael Erwine
[REDACTED]

Dear Mr. Erwine,

Thank you for your interest in the position of Deputy Sheriff with the Douglas County Sheriff's Office.

We have determined you did not successfully complete the background evaluation/testing and therefore are no longer considered an eligible applicant for employment with our office.

It is our practice to keep our investigation confidential, therefore there is no further information I can provide you in regard to this decision.

Again, I thank you for your time and interest in employment opportunities with the Douglas County Sheriff's Office.

Sincerely,

Paul T. Howell, Undersheriff

By: 

Trina Carter, Administrative Secretary



ALEXANDER PEREZ
CHIEF OF POLICE

November 14, 2017

Michael Erwine
[REDACTED]

VIA EMAIL: mikeerwine22@aol.com

Dear Michael,

An in-depth investigation into your background has been completed by the North Las Vegas Police Department. We regret to inform you that you are ineligible to continue in the employment process for the position of Police Officer for the following reason(s):

- | | |
|---|---|
| <input checked="" type="checkbox"/> Character Issues | <input type="checkbox"/> Criminal History/Involvement |
| <input type="checkbox"/> Driving History | <input type="checkbox"/> Drug History/Involvement |
| <input checked="" type="checkbox"/> Employment History | <input type="checkbox"/> Financial History |
| <input type="checkbox"/> Medical Standards Not Met | <input type="checkbox"/> Military History |
| <input type="checkbox"/> Psychological Standards Not Met | <input type="checkbox"/> Truthfulness Issues |
| <input type="checkbox"/> Involuntary Withdraw:
(Incomplete background packet and/or requested information not received by NLVPD; did not attend scheduled appointments.) | |
| <input type="checkbox"/> Voluntary Withdraw:
(Verbal/written notification received from you indicating that you are no longer interested in this position.) | |
| <input type="checkbox"/> Other: (Please specify): _____ | |

The NLVPD is committed to establishing a strong department by using objective guidelines designed to determine the character and suitability of each applicant. Our background process reflects that goal through a strict adherence to our hiring standards.

The Department's hiring standards, the details of the background investigation, and all information obtained during the background process **are confidential and cannot be disclosed.**


The North Las Vegas Police Department would like to thank you for your interest in employment with our agency. However, in accordance with Civil Service Rules and Regulations and the City of North Las Vegas Municipal Code 2.68.090, you will no longer be considered for employment with the NLVPD at the present time.

The statement(s) provided above is the only information the Department will release to you regarding your disqualification. You are disqualified indefinitely.

No assumption is made that you are ineligible for employment with another police agency. We wish you success in your search for employment.

Sincerely,

Alexander Perez
Chief of Police

By: 
Officer L. Lee #1848
Special Investigations

Reno Police Department
"Your Police, Our Community"



Jason Soto
Chief of Police

March 1, 2018

Erwine, Michael
[REDACTED]
[REDACTED]

Re: Police Recruit

Dear Mr. Erwine:

I regret to inform you that your application for employment with the Reno Police Department for the position listed above was rejected, based on your pre-employment background investigation.

The reason for disqualification will not be discussed as stated in the Pre-employment Investigation Discovery Waiver, which you signed and had notarized. It specifically states, "I hereby waive my right, now and in the future, to examine, review or otherwise discover the contents of this investigation and all related documents thereto".

This rejection does not preclude you from applying again for this position. Thank you for your interest in a position with the City of Reno.

Sincerely,

A handwritten signature in black ink, appearing to be "J. Bowden", written over a horizontal line.

Detective Bowden
Reno Police Department
Background Investigation Unit
775-657-4682